

DEQ Wastewater Permitting Program Activities and Institutionalization Pathways Related to BRC Discussions (5-6-04 draft)

DEQ “Action”		How to institutionalize
I WATERSHED-BASED PERMITTING		
A	Use a watershed-based approach to permitting (5-year cycle).	Statute *
B	Establish priority ranking based on environmental significance.	Program management/infrastructure → Policy Guidance
C	Establish a simple permit category.	Statute or rule
D	Establish a geographic general permit category.	Statute or rule
E	Extend expiration dates for permits with lower environmental significance.	Guidance policy (as follow up to regulatory language for WPCF)
F	Build flexibility into the 5-year schedule to allow permits to proceed if TMDL is delayed.	Statute or rule
II UP-TO-DATE, CONSISTENT WASTEWATER PERMITS		
A	Establish and maintain a watershed-based permit issuance plan.	Program management/infrastructure
B	Establish state-wide permitwriter tools; hold regular trainings.	Program management/infrastructure
C	Centralize policy development	Program management/infrastructure
D	Use receipts authority to process new permit applications and off-cycle permit modification requests.	Statute or rule
III SUFFICIENT, APPROPRIATE COMPLIANCE TOUCHPOINTS		
A	Establish a DEQ compliance/inspection schedule according to environmental significance.	Program management/infrastructure
B	Review DMR data on a monthly basis.	Program management/infrastructure → DMS system
IV TRANSPARENCY, EFFICIENCY, AND ACCOUNTABILITY		
A	Establish permit issuance and inspection plans (updated annually or every two years). Post on the website; share with EPA and EQC.	Website; report to EQC
B	Establish primary accountability measures; Report on	Statute; report to EQC

	these to the EQC (and post on DEQ website) on an annual basis.	
C	Migrate to electronic DMR review/submittal	Program management/infrastructure → DMS system
D	Remove requirement to establish a new general permit category only by rulemaking.	Statute
V	FULLY AND ADEQUATELY FUNDED W/W PERMITTING PROGRAM	
A	Program funded by a mixture of sources (maintaining approximately the same mixture as today).	Legislature, incl. Biennial budgeting process
B	Annualize all permit fees.	Statute and rule
C	Allow for an annual permit fee inflator.	Statute and rule
D	Simplify the permit fee structure.	Rule

*Statutory language generally provides broader policy direction. Specific implementation details are generally included in rule.